

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY (CAMDEN)

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Main Rd Apartments LLC

In re:

Chuckie S. Hollimon

Case No.: 21-10102

Chapter: 13

Hearing Date:

Judge: Andrew B. Altenburg Jr.

OBJECTION TO MODIFIED PLAN

Main Rd Apartments LLC, by and through counsel, Lori C. Greenberg & Associates, hereby objects to the confirmation of the Debtor's Modified Chapter 13 Plan filed on January 16, 2025 as follows:

1. The modified Chapter 13 plan proposes to cure post-petition rental arrears of \$4,364.00 through the plan.
2. Attached is Exhibit "A", the current rental ledger for the debtor. Debtor currently is due for \$6,947.00 plus February 2025 late fee of \$50.00 and attorney fees of \$1,072.00 for a total amount due of \$8,069.00.
3. The Creditor does not object to the post-petition amount due being paid through the modified bankruptcy plan but only objects to the amount to be paid through the plan.

Based on the above, Creditor hereby requests that the Plan be modified to provide for the post-petition amount due to be adjusted to \$8,069.00 and require the debtor to resume regular monthly rental payments as of March 1, 2025.

Date: February 13, 2025

/s/Lori C. Greenberg
LORI C. GREENBERG, ESQ.